

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

LISA LAMBERT,

Plaintiff,

v.

SUPERINTENDENT WILLIAM
WOLFE, in his individual capacity,
et al.,

Defendants.

Civil Action No. 96-247 Erie

DECLARATION OF LISA LAMBERT

I, Lisa Lambert, declare under penalty of perjury, the following facts:

1. In October of 1993 and over the next several months, Cambridge Springs officer James Eicher followed me around the institution and repeatedly offered me gifts and wrote "love letters" to me.

2. Eicher later increased his harassment of me by grabbing, fondling, and kissing me against my will.

3. On March 19, 1994, Eicher raped me for the first time. The rape occurred in inmate music room located in Curry Hall. While I was at the other end of the hallway, playing my guitar in the music practice room,

Sergeant James Merry appeared in the doorway and gave me an order to come with him immediately. Although I could not figure out what I had done to cause a sergeant to come for me, I complied and went with him. Sergeant Merry grabbed me by the arm and pushed me into the inmate music room, locked the door, and said that I wasn't coming out until I did what Eicher wanted me to do. Eicher then pulled down my sweatpants and kissed me. He then performed oral sex on me and forced me to have sexual intercourse with him. After Merry unlocked the music room door, I ran out.

4. Eicher raped me again on March 23, 1994. Earlier that day, Eicher had ordered me to meet him there, and ordered me to return again after dinner. That day he raped me twice; before dinner and after dinner in the Curry Hall Music Room. When raping me, Eicher ejaculated on my clothes, on a carpet, and on choir robes that were hanging nearby. Eicher told me that day: "You know you want it you fucking bitch, you whore."
[report]

5. On April 7, 1994, Eicher forced me twice to have intercourse with him inside the prison's fieldhouse. The first time, he pushed me onto a laundry table, pulled my sweatpants down, and entered me. During the second rape, Eicher pushed me down to a carpet, ejaculated on the carpet,

and smeared the semen with his boot. After the assault, Eicher threatened to "get me" if I told prison officials what he had done.

6. On August 20, 1994, Eicher followed me into a bathroom in a prison recreation area, pushed me into a toilet stall, pulled my pants down, performed oral sex on me, then pushed me over and raped me. After ejaculating, he raped me again. He was very rough with me that day. Eicher told me: "I want to fuck you, you fucking whore. You know you want it you slut."

7. On September 9, 1994, Eicher took me to the second floor of Alliance Hall where he performed oral sex on me and forced me to engage in sexual intercourse with him. Knowing it was my birthday, he threw my bra at me and asked: "How's that for a birthday present?"

8. On October 10, 1994, Eicher took me to Alliance Hall's second floor and raped me.

9. I reaffirm the testimony I gave about officer Eicher's abuse of me when I was deposed in 1999 by assistant attorney general Halloran as well as the testimony I gave about officer Raun's abuse of me.

10. The abuse I was subjected to by officers Eicher and Raun caused me a great deal of emotional distress and humiliation. Because of the abuse, I lost much of my appetite and a lot of weight. I had trouble

sleeping and often felt exhausted. In addition, large chunks of my hair fell out when I was confined in the prison's Restricted Housing Unit on Administrative Custody Status as a result of my allegations of abuse by those guards.

11. I was also very humiliated and emotionally distressed when, against my will, I was filmed nude after returning to Cambridge Springs on November 22, 1994 from a court appearance in Lancaster County related to my criminal case. Pictures of my exposed breasts, genitals and buttocks were taken that day by prison staff in the stripsearch area of Alliance Hall.

12. Not only did having pictures taken of the most private parts of my body cause me extreme humiliation (I felt degraded); I didn't know who would have access to the nude videotape/photographs of me.

13. Knowing that there would be pictures of my naked body somewhere in the institution and worried about who might see them caused me a great deal of embarrassment and distress.

14. Neither deputy Kormanik nor anybody else from the DOC told me that the film would be stored in Kormanik's office, that the film would be kept in a file drawer or in any other secured area, or that the pictures would not be distributed to anybody other than Kormanik. I was not told and did

not know where the filmed pictures would be kept or who would have access to the depictions of my naked body.

15. In addition to having pictures of my naked body taken, I was also filmed by prison staff while wearing my bra and underpants.

Executed this 13th day of December, 2006.

A handwritten signature in cursive script, appearing to read "Lisa Lambert", written over a horizontal line.

Lisa Lambert